

ENVIRONMENT COMMITTEE PUBLIC HEARING

February 25, 2013

Testimony in Opposition to

SB 914 AAC - The Application of Pesticides at Municipal Parks

**SB 916 AA - Authorizing Civil Penalties for the Faulty, Careless or
Negligent Application of Pesticides**

**SB 917 AA - Authorizing the Use of Certain Microbial and Biochemical
Pesticides and Grub Control Products on School Grounds**

HB 6438 AA - Restricting the Use of Methoprene and Resmethrin

HB 6440 AAC - Municipalities and the Application of Lawn Care Pesticides

I am writing in my capacity as Director of Parks & Recreation for the Town of South Windsor and as a member of the Connecticut Recreation and Parks Association, Inc. (CRPA), which represents about 600 individual professionals in the parks and recreation field and 122 of the 169 municipal park and recreation departments in Connecticut.

I am also a current member of the following professional organizations: National Recreation & Parks Association, New England Parks Association, New England Sports Turf Managers Association. I also oversee department staff members who belong to the CT Parks Association, CT Tree Protection Association, CT Tree Warden Association, and the CT Grounds Keeper Association.

SB 914 AAC - The Application of Pesticides at Municipal Parks

The current ban on pesticides on K-8 school grounds, PA 09-56, is severely flawed and not based on sound scientific research. Expanding this flawed legislation to a new level, public parks, is not only beyond common sense, but destined to failure. Products used under world-wide accepted IPM guidelines have been studied and approved by the US Environmental Protection Agency, the Center for Disease Control, the Food and Drug Administration, and our state's own Department of Energy and Environmental Protection (DEEP). An ad hoc committee, formed with educators and scientists from the University of Connecticut, the CT Agricultural Experiment Station, CT Department of Energy and Environmental Protection and CT Public Health Department have agreed, in principle, that the current law banning pesticides simply does not work. If there was a silver bullet, an organic product that was truly effective, both financially and results, we would all be using it, but there simply isn't at this time. If this bill is approved by the Legislature, the use of herbicides and pesticides on all public parks would be banned. I respectfully, and strongly oppose.

SB 916 AA - Authorizing Civil Penalties for the Faulty, Careless or Negligent Application of Pesticides

As the current law already provides for fines, imprisonment and civil penalties within various sections of the Connecticut General Statutes, I would question the need for this proposition. Additional clarification is needed, and requested, to better understand the proposal, although I would agree that applicators should be accountable and held responsible and penalized if not.

SB 917 AA – Authorizing the Use of Certain Microbial and Biochemical Pesticides and Grub Control Products on School Grounds

This bill needs to better define “certain microbial and biochemical pesticides”. For example, one might consider Nematodes a microbial treatment, yet others would disagree. Either way Nematodes are already allowed within the ban as they don’t have an EPA registered number. I, along with many of my colleagues, do not know of any microbial or biochemical pesticides that would control grubs? Acelepryn, which is a very safe and effective treatment for grubs, is neither a microbial or a biochemical product. **I respectfully, and strongly oppose the bill as written.**

HB 6438 AA – Restricting the Use of Methoprene and Resmethrin

These chemicals are commonly used for mosquito control, and critical weapons in the battle against the West Nile Virus as a public health hazard. Methoprene is a larvicide used to control immature mosquitoes in aquatic habitats, and Resmethrin is an adulticide used to control active adult mosquitoes typically with spray applications. Both insecticides are registered by the EPA and included as part of the CT DEEP Wildlife Division’s “Wetland Habitat & Mosquito Management Program”, which is IPM based. Both agencies claim that these products *“do not pose any health hazards to humans or the environment when used in accordance with the label”*.

Our primary approach in South Windsor is through biological control measures (applying a natural bacillus larvicide to target areas early in the breeding season greatly reducing the biting adult population) all under the guidance of CT DEEP. On a limited basis we have used both dunks (larvicide) in ponds and wetlands and spray applications (adulticide) in our parks under the direction of our Health Department. Public education is our third method to protect our residents. I, along with my fellow CRPA members, would like to request that research conducted by scientists from the University of Connecticut, the CT Agricultural Experiment Station, CT Department of Energy and Environmental Protection and CT Public Health Department provide data relevant to this bill. Many shoreline communities whose economic vitality is dependent on tourism could be adversely affected. Once again, please make decisions based on scientific research. **I respectfully, and strongly oppose this bill.**

HB 6440 AAC – Municipalities and the Application of Lawn Care Pesticides

I strongly suggest that the current practice by which the Department of Energy and Environmental Protection sets the state-wide standard for pesticide application should remain in place. Unlike DEEP, municipalities do not have the resources to develop their own policies and procedures based on science, education and research. Nor do they have the resources to monitor and enforce on private property. The bigger fear I would think is the inconsistency in regulations that would undoubtedly occur from town to town across the state.

Once again, I respectfully, and strongly oppose this bill.

Thank you for your time, and thoughtful deliberations on these crucial issues.

Ray Favreau

Director of Parks & Recreation, Town of South Windsor

Legislative Committee Member, CT Recreation and Parks Association